

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

SHAHRAM (STEVE) KETABCHI,

Defendant.

Case No. 22 Civ 2323 (SHS)
(Crim No. 1:17-cr-00243-SHS-3)

Hon. Sidney H. Stein
United States District Judge

MOTION FOR COURT FOR EXTENSION OF TIME

I, Shahram (Steve) Ketabchi, petitioner herein and defendant in the underlying criminal case, proceeding *pro se*, herewith move to this Court to afford me the opportunity to reply to the *Memorandum of Law of the United States in Opposition to Motion to Vacate*, Dkt.7, filed May 17, 2022.

1. Pursuant to Rule 5(d) of the *Rules Governing Section 2255 Proceedings*, a movant “may submit a reply to the respondent’s answer or other pleading within a time fixed by the judge.” Petitioner previously asked this Court to permit him to reply to the Government’s *Response* by the close of business on Wednesday, June 22, 2022. Now, Petitioner seeks an additional two weeks, until Wednesday, July 6, 2022, to respond.

2. My brother and co-defendant, Arash Ketabchi, has been sent to home confinement in the Los Angeles area, having arrived Wednesday. He has told me that he wishes to confer with me regarding the case, something we have not been able to do freely, but he must obtain permission

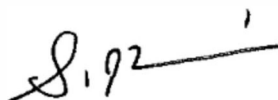
from his supervisor in the halfway house, just as I have gotten permission from my Probation Officer.

3. The length of time I seek will enable Arash to obtain the permission he needs so that we may meet to, among other things, review several hours of audio files and dozens of documents. I intend to file a proper reply that responds to the government's opposition while not raising new or irrelevant material, but this requires a lot of work on my part.

4. The additional time sought for a reply will not unduly delay the proceeding, nor will it prejudice the Government or tax the resources of the Court. I have already served my sentence. As a *pro se* litigant, I require more time than a seasoned lawyer. The limitations facing *pro se* litigants are well known and provide good cause for the grant of this request.

WHEREFORE, good cause having been shown, the Court should permit me to reply to the Government's *Memorandum in Opposition* by the close of business on Wednesday, July 6, 2022. The statements of fact made herein are true, under penalty of perjury.

Executed June 16, 2022



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Defendant's request for an extension of time to reply until July 6 is granted. The Clerk of Court shall send a copy of this Order to defendant. No further adjournments will be granted.

**Dated: New York, New York
June 22, 2022**

SO ORDERED:



Sidney H. Stein, U.S.D.J.